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Attorneys for Defendant  
AMERICAN AIRLINES, INC.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NORA FARACE, an individual,	)	
ANTHONY F. FARACE, an individual,	)	Case No. 2:10-cv-00724
	)	
Plaintiffs,	)	
vs.	)	
	)	
AMERICAN AIRLINES, INC., a Foreign	)	
Corporation; CLARK COUNTY	)	
DEPARTMENT OF AVIATION, a	)	
Political Subdivision of the State of Nevada	)	
as owner and operator of McCARRAN	)	
INTERNATIONAL AIRPORT; and ROE	)	
CORPORATIONS I through XXX,	)	
inclusive,	)	
	)	
Defendants.	)	

**DEFENDANT AMERICAN AIRLINES, INC.'S STATEMENT OF REMOVAL**

COMES NOW Defendant AMERICAN AIRLINES, INC., by and through its counsel,  
Alan W. Westbrook, Esq., of PERRY, SPANN & WESTBROOK, a Professional Corporation,  
and pursuant to the Order of this Honorable Court provides its Statement Regarding Removal as  
follows:

1           1.       The date(s) on which you were served with a copy of the complaint: Complaint  
2 was not served on Defendant; First Amended Complaint was served on April 29, 2010.  
3

4           2.       The date(s) on which you were served with a copy of the summons: April 29,  
5 2010.

6           3.       In removals based on diversity jurisdiction, the names of any served defendants  
7 who are citizens of Nevada, the citizenship of the other parties and a summary of defendant's  
8 evidence of the amount in controversy:  
9

10           Both Plaintiff Nora Farace and Plaintiff Anthony F. Farace are citizens of Illinois.  
11 Defendant American Airlines, Inc. is incorporated in the State of Delaware. Defendant Clark  
12 County Department of Aviation is a political subdivision of the State of Nevada as owner and  
13 operator of McCarran International Airport.

14           Based upon the representation of Plaintiffs' counsel that Plaintiff Nora Farace has  
15 incurred in excess of \$80,000.00 in medical expenses, Defendant American Airlines, Inc.  
16 believes the amount in controversy exceeds \$75,000.00.  
17

18           4.       If your notice of removal was filed more than thirty (30) days after you first  
19 received a copy of the summons and complaint, the reason removal has taken place at this time  
20 and the date you first received a paper identifying the basis for removal: Not applicable.  
21

22           5.       In actions removed on the basis of the court's jurisdiction in which the action in  
23 state court was commenced more than one year before the date of removal, the reasons this  
24 action should not summarily be remanded to the state court: Not applicable.  
25

26 ...

27 ...

1  
2 6. The name(s) of any defendant(s) known to have been served before you filed the  
3 notice of removal who did not formally join in the notice of removal and the reasons they did  
4 not: Not applicable.

5 DATED this 19 day of May, 2010.

6 PERRY, SPANN & WESTBROOK  
7 A Professional Corporation

8   
9

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17 Attorneys for Defendant AMERICAN AIRLINES,  
18 INC.  
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**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 19 day of May, 2010, a true and correct copy of the foregoing **AMERICAN AIRLINES, INC.'S STATEMENT OF REMOVAL** was served by depositing the same in the U.S. Mails at Las Vegas, Nevada, postage fully prepaid, and addressed to the following:

Donald C. Kudler, Esq.  
CAP & KUDLER  
3202 W. Charleston Blvd.  
Las Vegas, NV 89102  
Telephone: (702) 878-8778  
Facsimile: (702) 878-9350  
E-Mail: donaldkudler@capandkudler.com  
Attorneys for Plaintiffs

  
An Employee of PERRY, SPANN &  
WESTBROOK, A Professional Corporation

**AFFIRMATION**  
**Pursuant to NRS 239B.030**

The undersigned does hereby affirm that the preceding document, filed in United States District Court, District of Nevada, Case **Farace v. American Airlines, Inc.**, Case No. **2:10-cv-00724**:

☒ Does not contain the social security number of any person.

**-or-**

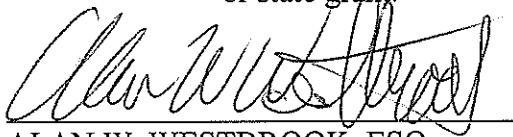
☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

\_\_\_\_\_  
State specific law

**-or-**

B. For the administration of a public program or for an application for a federal or state grant.

  
\_\_\_\_\_  
ALAN W. WESTBROOK, ESQ.  
Attorney for Defendant  
American Airlines, Inc.

5/19/10  
Date